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REPORT OF FINDINGS

LEVEL I ENVIRONMENTAL SITE ASSESSMENT

CARSON OIL COMPANY

PORTLAND, OREGON

Prepared for:

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REPORT OF FINDINGS

LEVEL I ENVIRONMENTAL SITE ASSESSMENT CARSON OIL COMPANY PORTLAND, OREGON

1.0 INTRODUCTION

Century West Engineering Corporation (Century West) has been retained by U.S. Bank to perform a Level I Environmental Site Assessment (ESA) on a parcel of land currently owned by the Carson Oil Company located at 3125 Northwest 35th Avenue in the northwest quarter of Section 29, Township 1 North, Range 1 East.

The ESA consists of two distinct tasks: 1) a review of documents and of oral information; and, 2) a site examination. The investigation is considered "Level I" because it included only a review of available documents and a site examination. Conclusions and recommendations within this report are based solely on observed evidence and data collected during the performance of the Scope of Services. The Scope of Services of the ESA is presented in Appendix A.

The findings of the ESA are presented in the following sections:

- 2.0 Information Review
- 3.0 Site Examination
- 4.0 Impacts from Adjacent Properties
- 5.0 Conclusions

- 6.0 Recommendations
- 7.0 Limitations
- 8.0 References

This report has been prepared for the exclusive use of U.S. Bank with specific application to the subject property in Portland, Oregon. The use of this report, its contents, or any part of it by a party, or its agents, other than the ones for whom this report was prepared, is herewith disallowed.

2.0 INFORMATION REVIEW

The purpose of the information review task is to gather environmentally related data on the site prior to the site examination. The information review enables Century West personnel to: 1) gain knowledge of the types of activities performed at the site; 2) identify data gaps prior to the examination; and, 3) recognize discrepancies between reported and observed data. A knowledge of past and current activities performed at the site enables the Century West personnel to research the types of potential environmental concerns which may be associated with a particular activity. Data gaps identified during the document review are filled by interviewing facility personnel, by observations during the site examination or by additional detailed investigation. Discrepancies in recorded data are reported and, where possible, clarified by interviewing facility personnel. The identification of discrepancies in the data may also require additional detailed study.

During this task, Century West determined whether files pertaining to the site exist at the Department of Environmental Quality (DEQ) or within the Environmental Protection Agency's Comprehensive Environmental Response, Compensation and Liability Information System List (CERCLIS List) and Facility Index System (FINDS) list. Additional site information was reviewed from a variety of state and local agencies. The following sections present information from the interviews and document review:

- 2.1 Department of Environmental Quality (DEQ) File Review
- 2.2 CERCLIS List Review
- 2.3 FINDS List Review
- 2.4 State Fire Marshal's Office File Review
- 2.5 Aerial Photograph Review
- 2.6 United States Geological Survey (USGS)
- 2.7 Oregon Department of Water Resources

2.1 Department of Environmental Quality (DEQ) File Review

The DEQ currently administers a number of different programs designed to protect the environment and monitor the generation, storage, treatment and disposal of hazardous substances. As part of the document review, the following DEQ program files were reviewed:

- 2.1.1 DEQ Underground Storage Tank Files
- 2.1.2 DEQ Northwest Region LUST List
- 2.1.3 DEQ Hazardous Waste Generators File Review
- 2.1.4 DEQ Site Assessment Database

2.1.1 DEQ Underground Storage Tank Files

A review of the DEQ's Underground Storage Tank (UST) Program file indicated the presence of 15 registered USTs on the subject property. In addition, there was a record of four USTs owned by Arrow Transportation which were decommissioned when the property was purchased by Carson Oil.

Registered USTs in the subject area and adjacent to the subject area (within one-quarter mile) include;

DEQ REGISTERED UST LIST			
FILE NUMBER	NAME	ADDRESS	NUMBER OF TANKS
5039	ANR Freight System	3333 NW 35th	4 P, 4 A
3066	Carson Oil Company	3125 NW 35th	15 P, 15 A, 3 D
6362	Don Thomas Petroleum	2727 NW St. Helens Road	3 P, 3 A
4358	Hill Investment (Nabisco Warehouse)	3322 NW 35th	4 P, 4 D
4641	Holman Distribution Center	3250 NW Guam	1 P, 1 D
4095	Myers Container Corporation	3000 NW St Helens Road	1 P, 1 A
3493	Wilhelm Trucking Company	3250 NW St. Helens Road	2 P, 2 D
Α	= Permitted = Active = Decommissioned		

2.1.2 DEQ Northwest Regional LUST List

A review of the DEQ's Northwest Regional LUST list did provide an indication of a LUST reported on the subject property.

Other LUSTs within one-half of a mile of the subject property are listed below.

DEQ LUST SITES			
LOG NUMBER	LOCATION	ADDRESS	MATERIAL RELEASED
26-91-063	A N R Freight Systems	3333 NW 35th	Diesel
26-91-235	Carson Oil Company	3125 NW 35th	Hydraulic Oil
26-89-280	Hill Investment/Nabisco Warehouse	3322 NW 35th	Diesel
26-90-219	Northwest Steel	3441 NW Guam	Mineral Oil
26-89-230	Wilhelm Trucking	3250 NW St. Helens Road	Diesel

The following information regarding the LUSTs at contiguous or nearby properties is a summary of material from the DEQs files.

The ANR Freight Systems site is located immediately north of the subject property. It consists of an office building, a loading dock, and a vehicle maintenance building. The office and loading dock are located on the northern margin of the ANR property. The vehicle maintenance building is located near the southern margin, approximately 50 feet north of the subject property. There appear to be four USTs located around the maintenance building: 1) an 8,000 gallon new oil tank; 2) a 2,000 gallon used oil tank; 3) a 1,000 gallon gasoline tank; and, 4) a 20,000 gallon diesel tank.

In February 1991, diesel contamination was discovered in the groundwater and gravel pack associated with a monitoring well located near the diesel UST. The contamination was apparently the result of spillage and overfills at the fuel island entering an improperly constructed well. A tank and line test of the diesel system conducted in February 1991 indicated that the system was not leaking.

The most current entry in the file is a telephone log of a call from the DEQ to ANR's consultant dated May 31, 1991. It indicates that a quarterly report on the site would be due in mid-July. The July report was not included in the file. Information on the extent of diesel contamination at the site is apparently not yet available. However, information in the file indicates that groundwater in the area is moving to the southeast towards the subject property.

The failure of a line test conducted at the Carson Oil Company in June 1991 was due to a small leak in an above ground line near the barreling facility. The leak was in a line carrying hydraulic oil and was repaired. There was no indication in the file regarding the amount of product that had been released, if any.

Hill Investment Company Warehouse also known as the Nabisco Warehouse is located approximately 300 feet northeast of the subject property. Chlorinated solvents and petroleum hydrocarbons were detected in the groundwater at the site, between November 1989 and September 1990, during tank decommissioning activities. Soils remaining in the excavation following removal of some of the contaminated soil contained up to 33,000 ppm Total Petroleum Hydrocarbons (TPH).

A Corrective Action Plan (CAP) was submitted for diesel contamination at the site on June 24, 1991 by Hill Investment's consultant, Hart-Crowser. The final CAP called for quarterly monitoring of groundwater in four monitoring wells for a minimum of one year. The DEQ generally accepted the CAP noting: 1) the contamination appeared limited in extent; 2) groundwater impacts from the remaining contamination appeared minimal; 3) contaminant migration would be very slow; and, 4) natural degradation of the diesel contamination would further reduce concentrations. Issues concerning the discovery of halogenated solvents at the site will apparently be addressed in a separate report.

The LUST file for *Northwest Steel Processing, Inc.* at 3441 NW Guam actually contains information on an investigation conducted at the current site of the *Weyerhaeuser* site at 3116 NW Guam in the fall and winter of 1989. The Weyerhaeuser property is located 50 feet east of the subject property, across Guam street.

The investigation of the site was conducted prior to a transfer of ownership. The initial records review identified potential petroleum and metal impacts from off-site sources. Two monitoring wells were completed across the street from the subject property, along NW 35th near the northwest and southwest corners of the property. Groundwater samples collected from the wells were analyzed for TPH and heavy metals. Neither petroleum hydrocarbons or heavy metals were detected in the samples.

An investigation of on-site petroleum impacts was also conducted. It was found that some water-soluble cutting oil and mineral oil had been disposed of in dry wells located inside the building. The reported highest TPH value was 65,600 ppm. The area of contamination, however, was limited and the product relatively immobile. The DEQ recommended that the dry wells be permanently abandoned after removal of soils with the heaviest contamination.

During the decommissioning of five USTs at the Wilhelm Trucking Company in October 1989, diesel contamination was found in one of the excavations. Approximately 200 yards of contaminated soil were removed. The maximum TPH concentration reported following the soil removal was 33 ppm. The DEQ issued a No Further Action letter for the site on April 16, 1991.

2.1.3 DEQ Hazardous Waste Generators File Review

A review of the DEQ files on Regulated Hazardous Waste Generators provided no record or other evidence that would indicate that the subject property is listed as a small quantity or fully regulated hazardous waste generator.

The following companies are located within one-quarter mile of the subject property and are listed as small quantity generators.

Ashland Chemical	3322 NW 35th
Halls Piggyback Service	3250 NW Guam
Myers Container Corporation	3000 NW St Helens Road
Nabisco Brands Inc.	3322 NW 35th

The following nearby company is listed as a fully regulated generator:

In addition to the above state DEQ listings, the following companies are found on the federal EPA Region 10 RCRA Handlers and Transporters list and are within one-quarter of a mile of the subject property.

ANR Freight Systems	3333 NW 35th
Ashland Chemical	3322 NW 35th
Carson Oil Company	3125 NW 35th
Columbia American Plating	3003 NW 35th
John Crane Company	2719 NW St. Helens Road
Myers Container Corporation	3000 NW St. Helens Road
Nabisco Brands Inc.	3322 NW 35th
Pfitzer Inc Distributing	3333 NW Industrial Street.
Wilhelm Trucking Company	3250 NW St. Helens Road

The file on Carson Oil indicates that the company is a conditionally exempt generator of hazardous waste. The file also contains information on Arrow Transportation's activities at the site in 1985 and 1986. Arrow generated a single shipment of 90 gallons of waste trichloroethylene (TCE) after cleaning a tanker truck.

2.1.4 DEO Site Assessment Database

A review of the current DEQ Site Assessment list provides no record or other evidence that would indicate that the subject property is listed on the DEQ Site Assessment Database. The DEQ Site Assessment Database is a listing of sites where there has been:

- 1. A confirmed release of a hazardous substance.
- 2. A confirmed release and investigation or cleanup has been initiated or completed; or
- 3. No confirmed release but the DEQ has received information indicating that there may have been a release of a hazardous substance.

Further review of the DEQ Site Assessment Database indicated that the following sites are located within one mile of the subject property and are included on the Database list.

Brazil & Company	4315 NW St. Helens Road
Burlington Northern -	NW Yeon
HUB Center	- · · · · · · · · · · · · · · · · · · ·
Columbia American Plating	3003 NW 35th
Dasic International Corp.	3125 NW Front
Dura Industries	4466 NW Yeon
ESCO Plant #3	2141 NW 25th
Hercules Inc.	3366 NW Yeon
Magnus Company Inc.	3074 NW St. Helens Road
Marathon	2615-19 NW Industrial
McWhorter	4155 NW Yeon
Mercer Industries	2636 NW 26th
Mount Hood Chemical	4444 NW Yeon
Nabisco Warehouse/	
Hill Investment	3322 NW 35th
Nudelman & Son, Inc.	2707 NW Nela
Paco Pumps	2551 NW 30th
States Battery	2258 NW Suffolk
Texaco Terminal	3640 NW St. Helens Road
Van Waters & Rogers	3950 NW Yeon

Nine of the eighteen SAD sites are also CERCLIS sites which are also listed in Section 2.3, "CERCLIS List Review". However, they are only described in this section. All of the neighboring sites listed on the DEQ Site Assessment Database are summarized as follows:

Brazil & Company located at 4315 NW St. Helens Road, approximately one mile northwest of the subject property, is listed in database file Number 1026. There has not been any investigation conducted at the facility and there is no specific information on any contamination. The site is listed because the property owner may have routinely dismantled transformers and disposed of their contents on the site.

The Burlington Northern HUB Center is a rail road switching station located off NW Yeon, approximately one-half mile northeast of the subject property. The site is listed with DEQ as File No. 100. A small spill (15 to 20 gallons) of heavy oil occurred at the site and entered the Willamette River via a storm sewer. The oil was contained by a boom and cleaned up.

Columbia American Plating located at 3003 NW 35th, is located immediately south of the subject property. A DEQ Notice of Violation dated May 30, 1984 indicates that DEQ has reviewed a report documenting the on-site surface release of 2,500 gallons of 30% hydrochloric acid that occurred on April 28, 1984. The report commends the company's response in neutralizing, containing and cleaning up the spill. The notice also indicates that Columbia American Plating was in violation of a number of Oregon hazardous waste regulations, including storage of hazardous wastes over 90 days. On August 15, 1991 the owners of the property, LAKEA Corporation, received the largest fine ever assessed by the DEQ for hazardous waste management violations, \$52,500, after failing to comply with an earlier order. The CERCLIS List indicates a No Further Action designation under CERCLA has been assigned to this site. For more information on this property, refer to Section 4.0, Impacts from Adjacent Properties.

Dasic International Corporation, located at 3125 NW Front Avenue, approximately one-half mile northeast of the subject property, is listed as File No. 110. The Site Report summary indicates that a surface spill containing triethanolamine, kerosene and various solvents may have entered into a storm sewer that empties into the Willamette River.

Dura Industries located at 4466 NW Yeon. is approximately one mile northwest of the subject property and is listed in DEQ file Number 111. The business received several Notice of Violations for their hazardous waste management practices as of 1988. There is also some indication that there may be slightly elevated levels of cadmium, chromium, and lead at the site.

ESCO Plant #3, located at 2141 NW 25th Avenue, approximately one-half mile to the southeast of the subject property, is listed as File No. 112. The Site Report summary indicates that phenols were released to the surface of the soil with a detectable concentration of 2.8 ppm. However, the file indicates that the discharge problem was corrected and no remedial activities were necessary.

Hercules Inc., located at 3366 NW Yeon Ave, approximately one-third of a mile to the northeast of the subject property, is listed as a CERCLIS site. The DEQ Site Report summary dated November 13, 1990, indicates that the facility is an industrial chemical manufacturing plant (resins, plastics, and fatty acids). The summary also indicates that no

evidence of a confirmed release of hazardous substances was observed. The EPA CERCLIS List indicates a No Further Action designation has been assigned to this site.

The Magnus Company, Inc., located at 3074 NW St. Helens Road, approximately one-eighth of a mile to the west of the subject property, is listed as a CERCLIS site. The DEQ Site Report summary indicates that the facility was a bearing rehabilitation plant in operation from 1930-1967. Furnaces were used to melt lead from the bearings. Cracks in the building's concrete floor were filled with lead. Also, lead dust settled on the structural beams within the building (detected concentrations up to 280 ppm). Lead has been detected in the soil at 39 ppm.

Marathon U.S. Realties, Inc., located at 2615-2619 NW Industrial Street, approximately one-half mile southeast of the subject property, is also listed as a CERCLIS site. The site is currently occupied by warehouses and parking areas. It was formerly occupied by a garbage incinerator and landfill. Hazardous substances found on the Marathon site include: lead (1.52 ppm in groundwater and 6,870 ppm in other), total petroleum hydrocarbons (7,510 ppm in groundwater and 1,310 in other) and chromium (0.156 ppm in groundwater and 25.9 ppm in other). The Oregon DEQ has indicated that only manganese was detected at a level slightly above the drinking water standard in the alluvial aquifer and that groundwater flow in the alluvial aquifer is estimated to be towards the west at 1.5 feet per year. The proposed remediation scheme for the Marathon site will most likely involve capping the soils (to prevent further water infiltration or creation of dust) with on-site groundwater monitoring.

McWhorter, Inc., listed in file Number 135, is located at 4155 NW Yeon, approximately three-quarters of a mile northwest of the subject property. Between 1980 and 1986 there were numerous releases of organic solvents at the site. Cleanup of the site is currently underway.

Mercer Industries (File No. 144) is located at 2636 NW 26th Avenue, approximately three-quarters of a mile northwest of the subject property. A letter from DEQ dated December 21, 1988, indicates that Mercer Industries had high levels of total chromium on the surface of a concrete trench through which waste water from pretreatment tanks exited to the city sewer. However, steam cleaning of the trench and subsequent verification sampling of the trench indicated that the chromium levels in the trench were significantly reduced. Subsurface soils sampling (one to three feet below ground) indicated that there was not any detectable concentrations of chromium in the subsurface. The letter also indicated that no further investigations were warranted at that time (December 21, 1988).

Mt. Hood Chemical Corporation, listed in file Number 81, is located at 4444 NW Yeon, approximately one mile northwest of the subject property. High pH materials and methylene chloride have been released from drums to storm sewers at the site in 1984. There do not appear to be any current investigative activities at the site, however, the DEQ site report indicates the file is still active.

Nabisco Warehouse/Hill Investment Company, located at 3322 NW 35th, approximately 400 feet north of the subject property, is listed in file number 1076. Halogenated solvents and diesel were discovered in groundwater at the site in August 1990. Solvent contamination at the site is located near the north-central margin of the property. Based on the estimated groundwater flow from north to south and decreasing solvent concentrations from north to south it appears that the solvent plume migrated onto the Hill property from off-site. Work at the site is ongoing.

Nudelman & Sons, Inc., located at 2707 NW Nela Street, approximately one-half of a mile east of the subject property, is listed as a CERCLIS site. The DEQ Site Report summary indicates that there has not been a confirmed release to the environment. Further, the summary indicates that a No Further Action (NFA) designation has been assigned under EPA Superfund Priority.

Paco Pumps (File No. 146) is located at 2551 NW 30th Street, approximately one-third of a mile east of the subject property. A surficial spill of PCB oil occurred at the site and was reported to DEQ in 1987. The source of contamination was unknown. Analytical results of the contaminated soil indicated levels as high as 15 ppm PCBs. Cleanup of the contaminated soil was completed in 1988. Analytical results of the remaining soil at a depth of 12 inches indicated levels of 3 to 5 ppm PCBs, which met DEQ approval.

States Battery Co., located at 2258 NW Suffolk (approximately one mile to the east of the subject property) is listed as a CERCLIS site. The DEQ Site Report summary indicates that the facility was a lead/acid battery plant. Lead and lead compounds possibly contaminated the soil, groundwater, and surface water, as well as a possible abandoned treatment pond close to the Willamette River. The summary further indicates that there are documented cases of high urinary lead concentrations in employees at this site. However, a confirmed release to the environment is not indicated. The EPA CERCLIS List indicates a No Further Action designation has been assigned to this site.

The Texaco Terminal is located at 3800 NW St. Helens Road, approximately one-half mile northwest of the subject property and is listed in DEQ file number 169. Approximately 30,000 gallons of petroleum products were released at the Texaco bulk fuel facility between 1925 and 1984. As of December 1988, approximately 14,000 to 15,000 gallons of product had been recovered via a recovery well system.

Van Waters and Rogers, is located at 3950 NW Yeon, approximately 400 feet north of the subject property and is listed in file number 330. The company packages, stores, and recycles various chemicals. There had been three releases of halogenated solvents and one release of toluene at the site as of September 1989. Groundwater concentrations of the solvents were as high as 580,000 ppm (58 percent). The owner of the property is working with the DEQ and EPA in investigative and remedial efforts at the site.

2.2 CERCLIS List Review

The EPA publishes a list of known sites that potentially may pose some degree of threat to the environment or the health of the general public. This list is known as the Comprehensive Environmental Response, Compensation and Liability Information System List (CERCLIS List). A review of this list was made to determine whether any known sites, suspected of posing a threat to the environment or human health, were present within a one-mile radius of the subject property.

The EPA National Priority List (NPL) of sites which pose an immediate threat to human health and or the environment was also reviewed. The nearest NPL Site is Gould Battery Inc. located at 5909 NW 61st, over two miles away from the subject site.

A review of the CERCLIS list provided no record or other evidence indicating that the subject property is a CERCLIS site. However, further review of the CERCLIS list indicated that the following sites within one mile of the subject property are found on the CERCLIS list:

Columbia American Plating	3003 NW 35th
Hercules Inc.	3366 NW Yeon
Magnus Company Inc.	3074 NW St. Helens Road
Marathon	2615-19 NW Industrial
Mogul Corporation	2852 NW 31st
Mount Hood Chemical	4444 NW Yeon
Nudelman & Son, Inc.	2707 NW Nela
States Battery	2258 NW Suffolk
Texaco Terminal	3640 NW St. Helens Road
Van Waters & Rogers	3950 NW Yeon

All of the above CERCLIS are also included in the Oregon DEQ Site Assessment Database and are discussed in Section 3.8, except for the Mogul Corporation site.

The Mogul Corporation is located at 2852 NW 31st, approximately one-third of a mile east of the subject property. A letter from the DEQ dated September 20, 1984 indicates that the Mogul Corporation produced water treatment chemicals for use in boilers and cooling towers. Rinsates and spills were directed to a neutralization sump. Mogul discontinued operations at the site by 1980. The DEQ letter states, "No hazardous wastes remain at the site, and therefore, no hazard to the public or environment exists." In addition, the letter recommends no further action at the site.

2.3 FINDS List Review

The EPA publishes a list of facilities that have federal discharge operations permits for air, water and land media. This list is known as the Facilities Index Systems (FINDS). FINDS

is a central inventory of facilities monitored or regulated by the EPA, with cross-references to the program office data bases that have additional information about the facility.

The following nearby (located within one-quarter mile of the subject property) companies are listed in the FINDS file:

		FINDS LISTINGS	
	COMPANY	ADDRESS	ТҮРЕ
ANR Freight Systems Inc.		3333 NW 35th	HWDMS, STATE
Carson Oil Co	ompany	3125 NW 35th	HWDMS
Columbia American Plating		3003 NW 35th	HWDMS, FATES, CERCLA
Lincoln & All	en Company	3460 NW Industrial	HWDMS
Magnus Comp	pany Inc.	3074 NW St. Helens Road	CERCLA
Myers Contain	ner Corporation	3000 NW St. Helens Road	CDS
Pfitzer Inc 1	Distributing	3333 NW Industrial	HWDMS
Wilhelm Trucking Company		3250 NW St. Helens Road	HWDMS
CICIS - DOCKET - FATES - FINDS - FRDS - HWCTDB - HWCTDB - PADS -	Radiation). Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), Office of Emergency and Remedial Response (Superfund). Chemical in Commerce Information System, Office of Toxic Substances (Toxic Substances Inventory). Office of Enforcement and Compliance Monitoring. Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and Toxic Substances Control Act (TSCA) Enforcement System, Office of Pesticides and Toxic Substances (Pesticides and Toxic Substances). The Facility Index System, Office of Information Resources Management The Federal Underground Injection Control Reporting System, Office of Drinking Water (Drinking Water). The Hazardous Waste Control Technology Database, Office of Research and Development and Office of Solid Waste. Hazardous Waste Data Management System, Office of Solid Waste (Solid Waste). PCB-Waste Handlers		
PCS - RCRA-J - STATE -	Permit Compliance System, Office of Water Enforcement and Permits. Medical Waste Handlers State Regulated Facilities.		
TRIS -	TRIS - Office of Toxic Substances (Toxic Release Inventory).		

2.4 State Fire Marshal's Office File Review

The State Fire Marshal's Office maintains a log of Hazardous Materials Emergency Incident Reports for Oregon.

There was no record in the file of a hazardous material response at the subject property.

2.5 Aerial Photograph Review

Reproductions of the aerial photographs for the years 1936 and 1989, are included in Appendix B.

- 1936 The immediate area of the subject property has been filled but is still undeveloped. Buildings which currently house Northwest Steel Company, Industrial Craters, Wilhelm Trucking, and Custom Cabinets, have been constructed.
- 1945 Apartments constructed by the Federal Government occupy the subject property and the much of the entire Guilds Lake area. There is a bulk fuel facility with four ASTs located approximately 500 feet southwest of the subject property on St. Helens Road.
- 1967 The apartments in the Guilds Lake area are gone and have been replaced by warehouses and other commercial structures. The main building and the former fuel island on the subject property have been constructed. There is also a small shed in the extreme southwest corner of the subject property.

Properties contiguous to the subject property appear as they do currently with the exceptions of Rose City Van and Storage and Columbia American Plating properties. At Rose City Van and Storage, warehouse space only covers the northern half of the lot rather than the entire lot. The former owner of the Columbia American Plating site, Soule Steel, had constructed the one story office building which currently fronts 35th street. The plating building, currently located to the west of the office building, does not appear in the photo.

The number of ASTs at the bulk fuel facility on St. Helens Road has increased by six to a total of ten.

1989 - The subject property appears much as it does currently. The old fuel island has been removed, the cardlock fuel island and storage shed have been constructed. The five 14,000 gallon ASTs currently located in the northwest corner of the subject property have not yet been constructed.

Contiguous properties appear as they do today. The bulk fuel facility on St. Helens Road is no longer present.

2.6 United States Geological Survey (USGS)

The subject property is located on the flood plain of the Willamette River near the northwest slope of the Tualatin Mountains. Approximately 120 feet of unconsolidated river sediments and 30 feet of fill material are present beneath the subject area. Material from the Willamette River was used to fill in Guilds Lake following the Lewis and Clark Exposition around 1900. The river sediments primarily consist of silts and sands deposited within regionally ponded waters of the Columbia and Willamette Rivers or during the filling of Guilds Lake. These ponds were formed as a result of glacial outburst flooding of the late Pleistocene Lake Missoula. Beneath the unconsolidated river sediments are flows of Columbia River Basalt.

Surface elevations in the vicinity of the subject site range from 20 to 1000 feet above sea level. The flood plain deposits of the Willamette River are believed to cover a high-angle normal fault which parallels the northern base of the Tualatin Mountains. This northwest trending fault is believed to have resulted in the uplift of the Tualatin Mountains to their present position.

Wells in the vicinity of the subject property are used to supply groundwater for commercial purposes. Water is generally obtained from either the unconsolidated river sediments which become thicker to the northeast (toward the Willamette River) or from fractured zones within the underlying Columbia River Basalt flows. Groundwater elevations vary seasonally but are generally approximately 10 to 15 feet above sea level. The groundwater gradient is very shallow and the flow direction, as measured in two nearby LUST investigations, is to the south.

Information on local geology and groundwater conditions was obtained, in part, from United States Geological Survey Water-Supply Paper 1119; Geology of Portland, Oregon and Adjacent Areas by Tremble (1963); State of Oregon, Department of Geology and Mineral Industries, Open-file Report 0-90-2; and Earthquake-Hazard Geology Maps of the Portland Metropolitan Area, Oregon, by Ian Madin (1990).

2.7 Oregon Department of Water Resources

Based on Department of Water Resources files, there is no record of any wells on the subject property. The files are only complete for the past 25 to 30 years, however.

3.0 SITE EXAMINATION

INTRODUCTION

A site examination of the subject property was conducted on November 13, 1991. The site examination consisted of touring the subject property, making observations of the environmental conditions and activities and visually observing the subject and adjacent properties for evidence of contamination. The findings of the site visit are presented below. Refer to Figures 1 and 2, the Vicinity Map and the Adjacent Properties Map, for the location of the subject property. For the locations of structures, tanks, and materials on the subject property, refer to Figure 3, the Size Map.

Photographs of the subject property including locations, directions of views, and descriptions are included in Appendix C.

Information collected at the Multnoman County Tax Assessors office indicates that the subject property is located in the Blythswood Addition, Tax Lot 11, Tax Map 2725, Section 29, Township 1 North, Range 1 East of the Portland 7.5 minute quadrangle. The only improvement listed in the file on the 3.49 acre site is a 3 story, 22,920 square foot, office building which was constructed in 1950.

The elevation of the subject property appears be at approximately 20 feet above sea level. Guilds Lake was filled in the 1920s to raise the land surface above the 100-year flood elevation of 14 feet.

3.1 Site History

Pre-1950

During the early 1900s, prior to the industrial development of the area, the Lewis and Clark Exposition was held on land surrounding Guilds Lake. The lake was filled following the exposition. In the 1920s, residences and small industrial businesses were built along St. Helens Road and north of the current site of Montgomery Park. Most of the Guilds Lake area remained undeveloped until World War II, when the federal government constructed apartments on most of the vacant land. Rapid industrial development began in the area after the end of the war. Development of the subject property also began in the late 1940s and early 1950s after the land was purchased by Arrow Transportation.

1950-1986

Arrow Transportation appears to have owned the property for the entire period between 1950 and 1986. The main structures currently on the subject property were constructed during this period. It appears that two structures have been removed or replaced: 1) the former fuel island and associated UST nest, located to the west of the steam cleaning pad; and 2) a small shed, located in the extreme southwest corner of the subject property. The

USTs associated with the former fuel island were decommissioned in 1986 when the subject property was sold to Carson Oil. DEQ records indicate that no evidence of petroleum contamination was found in soils excavated from, or remaining in, the pit. No detailed information on when the subject property was paved was discovered in the course of this investigation. However, it was paved at least once by Arrow.

1986-Present

Around the time that Arrow transferred ownership of the property to Carson Oil, the main building on the subject property was remodeled. Carson Oil has added a cardlock fuel island, a 5,000 gallon capacity oil/water separator, five ASTs, and a storage shed since acquiring the site.

3.2 Present Conditions

Environmental conditions and concerns in each area of the subject property are summarized below.

3.2.1 Main Building

Office Area

The three story office building currently houses the corporate headquarters for the Carson Oil Company. The credit and customer service departments are located on the top floor, sales and accounting are on the second floor, and the reception, dispatch, and conference rooms are located on the first floor.

Bulk Oil Warehouse

Bulk lube and hydraulic oils are packaged, stored, and sold in the warehouse area located on the south end of the main building. There is a small office on the east-central wall, a 55-gallon drum filling area on the west-central wall, and a loading dock in the both the southeast and southwest corner. The rest of the area consists of either storage or aisle space. Only oils which are not highly flammable are stored in the building. There is a catchbasin located in the bottom of the ramp for the west loading dock.

Drums are filled with oil from the ten lube oil USTs or a tanker trailer located immediately west of the warehouse. The oil passes from the tanks through a small pumphouse to a spout located inside the building. Empty drums are placed on a conveyer rack and are pushed under the fill spout. Any minor spillage is collected in a catch pan located under the rack and is eventually picked up for recycling. Some petroleum staining was noted on the floor in the fill area.

Vehicle Maintenance Area

The maintenance area is located to the west of the office building and east of the steam cleaning pad/volatiles storage area. There are three bay doors on the north side of the building and one on the south. Up to five heating oil delivery trucks can be parked in the building at one time. There are no vehicle hoists, Instead, the central bay has a three to four feet deep pit used for working under the vehicles. The company owns approximately 100 pieces of equipment, including 50 powered units. Maintenance personnel complete approximately 200 repairs per month.

There is a drainage grate located in the bottom of the pit and in front of the northern bay doors. The grate to the north of the bay doors is not yet connected to the oil/water separator. Carson Oil has not yet determined the endpoint connections of a grate located in the center of the pit.

Used or waste petroleum products and antifreeze are collected for recycling. Small parts are cleaned in a solvent tank containing 325 or 450 thinner. The few trucks that need air-conditioning repairs are sent to outside shops which are able to recapture freon.

Volatiles Storage Area/Steam Cleaning Pad

The volatiles storage area and steam cleaning pad are located in an open-ended building, to the west of the vehicle maintenance area. The northern two-thirds of the space is devoted to steam cleaning company vehicles and the southern one-third of the area contains palletized stacks of approximately fifty 55-gallon drums.

Petroleum products which are relatively more volatile than those stored in the warehouse are kept here. The products include various thinners and toluene.

An approximately 20 foot long drainage trench runs north-south in the steam cleaning area. Drainage from the trench is connected to the site's oil/water separator. The asphalt near the steam cleaning area appeared to be petroleum stained. Clay absorptive material, used to clean up small spills, is stored in barrels along the sides of the steam cleaning area.

3.2.2 USTs

Since Carson Oil bought the subject property in 1986 they have installed a total of 15 USTs. There are two UST nests on the subject property, one associated with the cardlock fuel island and the other with the oil warehouse. These are discussed below. The USTs registration form for the site is included in Appendix D

Cardlock Fuel Island

The cardlock island was constructed in 1987 by Carson Oil and is located on NW 35th street to the north of the main building. There are four 20,000 gallon USTs which contain regular, unleaded, premium, and diesel and one 10,000 gallon UST containing diesel in the nest. The STIP3 brand tanks were new when installed. The tanks and associated pressurized piping are fitted with Veeder Root brand and Red Jacket brand leak detection systems, respectively. Fuel levels are reconciled daily using sales and delivery records and manual sticking to the nearest one-quarter inch. The tanks have spill/overfill and cathodic protection.

Lube Oil

The lube oil tank nest was also installed in 1987 and is located to the west of the oil warehouse. There are four 2,000 gallon, three 3,000 gallon, and three 6,000 gallon USTs in the nest. The tanks are between four and seven years old. Hydraulic and lube oils are stored in the tanks. Oil levels are measured and reconciled daily. Product is delivered to the warehouse via suction lines. The tanks do not appear to have cathodic protection, a leak detection system, or a spill/overfill system.

Heating Oil

The main building has a 10,000 gallon UST containing "heavy oil" which is used for heating. It appears that the tank may have been installed when the main building was constructed over 30 years ago. The other USTs installed by Arrow Transportation during the 1950s were constructed of unprotected bare steel. Heating oil USTs are not currently regulated by the state or federal government. However, product releases from heating oil tanks are subject to the same cleanup standards which cover releases from gasoline or diesel USTs.

3.2.3 ASTs

Five 14,000 gallon diesel ASTs and associated fuel loading rack were constructed in the northwest corner of the subject property in 1991. The tanks are surrounded by an approximately two foot tall spill containment berm. A drainage trench connected to the oil/water separator is located beneath the loading rack. A Spill Prevention, Control, and Countermeasure (SPCC) Plan is required for the ASTs under the Clean Water Act. Carson Oil does have an SPCC plan for the subject property but it does not yet address a possible release from the ASTs. The plan is scheduled to be updated in January 1992.

3.2.4 Parking Area/Subject Property Borders

The entire area north and west of the main building is paved. All the catchbasins in the parking area drain into the oil/water separator. Company vehicles are parked in the central portions of the parking area. Employee vehicles are parked along the western margin of the property.

As a service to its customers Carson Oil takes back some of the empty drums which had contained product supplied by the company. Barrels containing residual amounts of product are emptied into a waste oil container located on the southern margin of the property. There is moderate to heavy petroleum staining on the ground near the waste oil container. The oil also appears to have drained to the east toward the catchbasin at the western loading dock.

4.0 IMPACTS FROM ADJACENT PROPERTIES

4.1 Introduction

The subject property is located in the Guilds Lake industrial area northwest of downtown Portland. The western margin of the area, along St. Helens Road, has been used for industrial purposes continuously since the early 1920s. Heavy development of the rest of the Guilds Lake area began in the late 1940s, after the end of World War II. Most of the properties in the industrial area have had several tenants and uses since their original development. Background levels of petroleum products, solvents, metals, and other contaminants are elevated throughout much of the area due to a history of waste releases by successive occupants.

The following section summarizes environmental concerns or threats posed by contiguous and other nearby properties.

4.2 Contiguous Properties

Columbia American Plating, 3003 NW 35th

Columbia American Plating (CAP) is located contiguous to the southern margin of the subject property. The company appears to have had two owners since it started conducting business at this site in the early 1970s. The current owner is the LAKEA Corporation.

Information from DEQ files indicates that the company has a history of poor hazardous waste management practices. In addition, currently there are severe waste water and hazardous waste management problems at the facility. In the past six months the company has received approximately \$60,000 in fines from the DEQ for failure to handle hazardous wastes properly. The company has appealed the most recent fine of \$52,500 on the basis of financial distress. It is the largest fine the DEQ has ever assessed for this type of violation. Selected information from the DEQ files is included in Appendix E

The hazardous waste containment area and waste water containment unit are located on the north side of the CAP property. They are separated from the subject property by a chain link fence. Wastes stored in the containment area include solutions containing cyanide and various heavy metals. During the visit to the subject property, Century West personnel noted drums labeled "hazardous waste" located on the CAP property immediately next to the fence separating the two properties (refer to photos 13 and 14 in Appendix C).

A site map in the DEQ file indicates that CAP has a solvent tank containing trichloroethylene (TCE) which is located in the southwest corner of the plating building. The most recent known release of hazardous materials by CAP which exceeded regulatory levels occurred in 1990. The company released cyanide solution to the sanitary sewer at levels 20 to 30 time higher than their permit allowed.

ANR Freight Systems, 3333 NW 35th

ANR Freight Systems is located immediately north of the subject property. The DEQ's LUST file indicates that there has been a diesel release at the ANR property. The USTs at the ANR site are located within 100 feet of the subject property. The extent of petroleum contamination on the property does not appear to be defined at this time. However, information on the groundwater gradient in the LUST file suggests that contamination would migrate toward the subject property

Myers Container Corporation, 3000 NW St. Helens Road

The Myers Container Corporation (MCC) is located on the western margin of the subject property. A review of DEQ file did not reveal any record of activities or conditions at MCC which would pose a threat to the subject property. However, the site has been used for drum recycling for approximately 40 years. City of Portland building permit records also indicate that laundry and waste oil recycling activities may have been conducted on the site.

There is an approximately 5,000 gallon AST located on the MCC property which is located immediately adjacent to the subject property. There appears to be moderate to heavy petroleum staining on the AST and the soil under the AST (refer to photo 16).

Wilhelm Trucking/Industrial Craters (Magnus, Inc.), 3250 NW St. Helens Road

The Wilhelm Trucking/Industrial Craters facility is located immediately northwest of the subject property.

DEQ files indicate that the building now occupied by Industrial Craters was once owned by Magnus Inc. and is on the CERCLIS list. The building is contaminated with lead and lead dust.

DEQ files indicate that a small amount of petroleum contamination was discovered at Wilhelm Trucking during the decommissioning of several USTs. The DEQ did not require further action at the site after the removal of some contaminated soil. The USTs had been located on the southwest corner of the Wilhelm property.

Weyerhaeuser (Northwest Steel), 3116 NW 35th

The Weyerhaeuser property, located immediately east of the subject property, is the subject of a DEQ LUST file for the buildings former owner, Northwest Steel. An environmental investigation of the site was conducted prior to the transfer of ownership. A small amount of mineral oil was found to have been released to dry wells inside the building. The DEQ did not require removal of the contaminated soil because the oil is relatively immobile and was not a large volume release. Groundwater samples collected from two borings located on the northwest and southwest corners of the property were tested for TPH and heavy metals. No petroleum hydrocarbons or heavy metals were detected.

Rose City Van and Storage, 2480 NW 35th

No information was discovered which would indicate that activities at the Rose City Van and Storage site would pose a threat to the environmental conditions on the subject property.

4.3 Nearby Properties

Ashland Chemical (Hill Investment/Nabisco Warehouse)

In the course of an UST decommissioning, soil and groundwater collected near the northeast corner of this site were found to contain diesel and chlorinated solvents. Remedial activities at the site are ongoing.

Van Waters and Rogers

Van Waters and Rogers is located to the northwest of the subject property. Records at the DEQ indicate that extremely high concentrations of chlorinated solvents and hydrocarbons have been found in the soil and groundwater at this property. Remedial activities at the site are ongoing.

Trumbull Asphalt

The Trumbull Asphalt facility is located to the north of the subject property next to the former ANR Freight Systems building. DEQ files contain information regarding releases of petroleum products to the sanitary sewers, soil, and groundwater from the facility.

Old St. Helens Road Bulk Fuel Facility

A bulk fuel facility, located on St. Helens Road to the southwest of the subject property, appears in the 1936, 1945, and 1967 aerial photographs reviewed for this report. No other information on the site was discovered in the course of the investigation.

5.0 CONCLUSIONS

Based on field observations and records review, Century West Engineering has prepared the following conclusions.

Surrounding Properties

* Environmental conditions on adjacent and nearby properties appear to pose a threat to conditions on the subject property.

Columbia American Plating (CAP) has a record of poor hazardous waste management practices which continues to the present. The subject property does not appear to be protected from a release of hazardous liquids from the waste water treatment unit or drums located immediately south of the subject property. It also appears that a release of hazardous liquids from the CAP property could enter the subject properties drainage system via the west loading dock catch basin.

The extent of a diesel release at the former ANR vehicle maintenance facility has not yet been defined. However, it has impacted the groundwater within 100 feet of the subject property.

The extent of petroleum contamination in the vicinity of an AST on the Myers Container Corporation property is not known.

The Guilds Lake Industrial area has high background levels of many contaminants including various solvents, petroleum products, and metals.

Aboveground and Underground Storage Tanks

* USTs at the cardlock island appear to meet the minimum requirements for leak detection, corrosion protection, and spill/overfill protection.

Lube oil USTs appear to meet leak detection requirements.

The company's SPCC plan may be out of compliance with Clean Water requirements due to the recent construction of the ASTs on the property. The SPCC plan is scheduled to be updated in January 1992.

The physical condition of the heating oil UST on the subject property is unknown and may pose a threat to environmental conditions on the subject property.

Other Issues

- There was no information examined in the course of the investigation indicating that past or current activities at the subject property have ever damaged environmental conditions either on the subject property or adjacent properties. There are several housekeeping issues, however, which appear to need to be addressed, including:
 - 1) The volatile storage area may be closer to the main building than is recommended in the National Fire Protection Association's Flammable and Combustible Liquids Code (NFPA 30).
 - 2) Spillage of petroleum products near the waste oil tank on the southern margin of the subject property has produced moderate to heavy staining of the surrounding asphalt. Spilled product could enter the drainage system on the subject property or enter the adjacent Columbia American Plating property.
 - 3) Drainage from grates in the vehicle maintenance area may bypass the oil/water separator.

6.0 RECOMMENDATIONS

Based on the findings of this investigation, Century West Engineering has prepared the following recommendations.

- * A characterization of subsurface conditions on the subject property is not recommended at this time.
- * DEQ records regarding conditions on adjacent properties should be examined on a regular basis until the environmental threats posed have been fully identified and resolved.

Key Carson Oil employees should periodically visually monitor conditions on the properties which are contiguous to the subject property.

- * USTs at the site will need to be upgraded to meet state and federal regulatory release detection, corrosion protection, and spill/overfill requirements. USTs installed in the late 1980s will be required to have continuous tank release detection monitoring by December, 1993 and corrosion protection and spill/overfill upgrading by December, 1998.
 - The heating oil UST at the subject property should be upgraded or Should replaced due to its age.
- * The SPCC plan for the subject property should be updated as Schooling scheduled.
- * Drainage from grates near the vehicle maintenance area should be connected to the oil/water separator or sealed as planned.

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7.0 LIMITATIONS

In part, these findings, conclusions and recommendations are based on the best available information known or made available by regulators, other consultants or other sources. Over time, the surficial evidence of some activities is obscured or obliterated entirely. It is possible that certain adverse conditions could exist at the site which were not detected in this evaluation.

The services provided under this contract as described in this report include professional opinions and judgments based on data collected. These services have been provided according to generally accepted engineering practices. The opinions and conclusions contained in this report are typically based on information obtained from:

- 1. Observations and measurements made by our field staff.
- 2. Contacts and discussions with regulatory agencies and others.
- 3. Review of available hazardous substance or solid waste lists.
- 4. Opinions and judgments of Century West based on the information available.

United States Bank (the Client), acknowledges that Century West has been retained for the sole purpose of assisting the Client in evaluating the environmental liability associated with the project site. It is recognized and agreed that Century West has assumed responsibility only for performing this investigation and presenting this report and conclusions to the Client. The responsibility for making any further evaluation, disclosure or report to any third party or for the taking of corrective, remedial and mitigative action, shall be solely that of the Client. The Client agrees to hold Century West harmless from any and all liability, damage, loss, cost or expense, including attorneys' fees, in any way arising from the claim of any third party. Century West agrees not to make, except to the Client or at the Client's request, any report to any third party not legally required of it.

In the professional judgment of Century West, the services performed pursuant to the Scope of Services are an adequate basis to collect data for a preliminary evaluation of the site and upon which to draw the conclusions stated in Section 5.0 of this Report of Findings.

Century West Engineering appreciates this opportunity to provide technical services. Please call if you have any questions regarding this report.

Sincerely,

CENTURY WEST ENGINEERING CORPORATION

Prepared By:

Robert G. Carson

Environmental Scientist

Reviewed By:

Christopher C. Wohlers

UST/ESA Program Manager, Portland

Tobut G. Carson

CCW:ljr

8.0 REFERENCES

Maps

U.S.G.S. Topographic Map - Portland 7.5 minute Quadrangle

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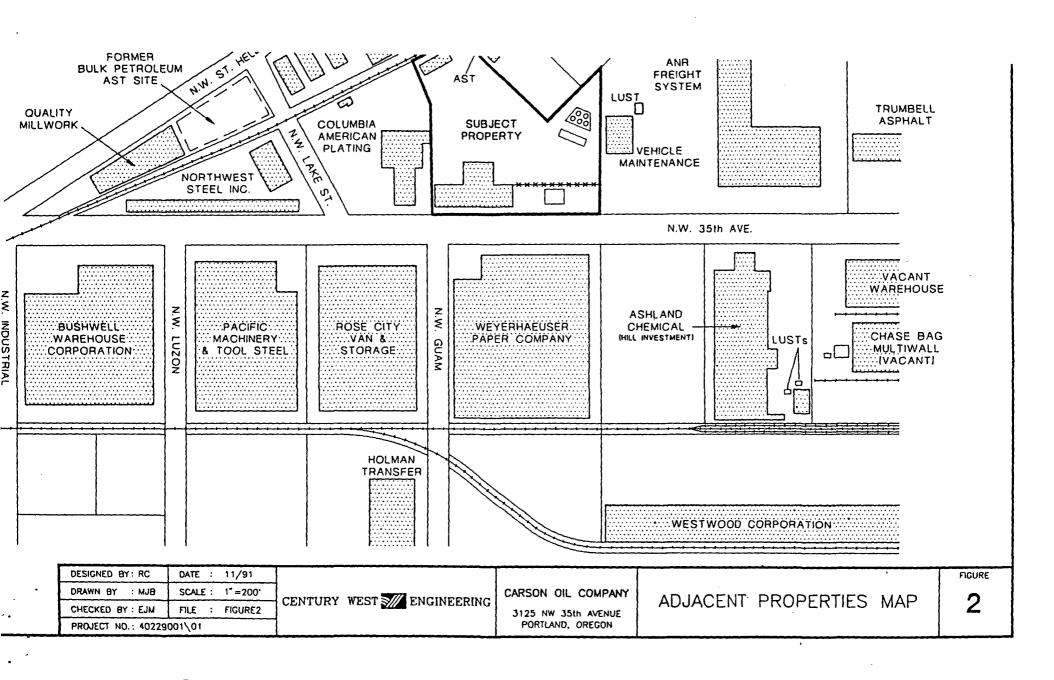
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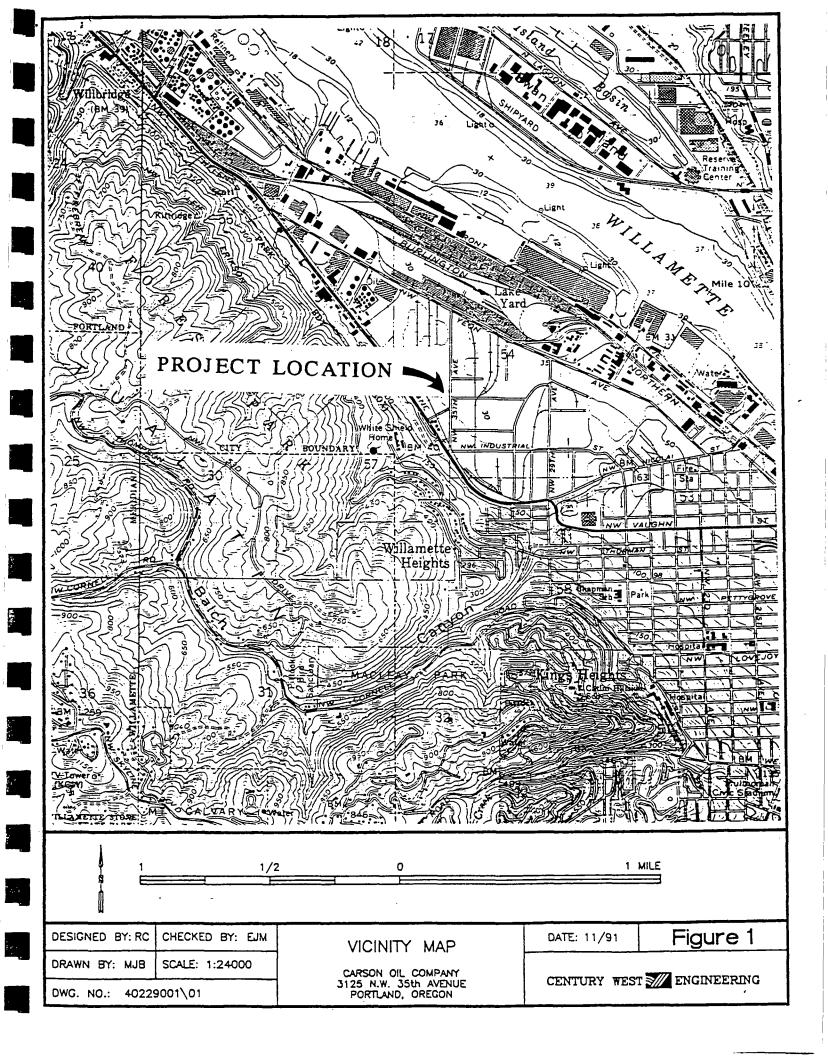
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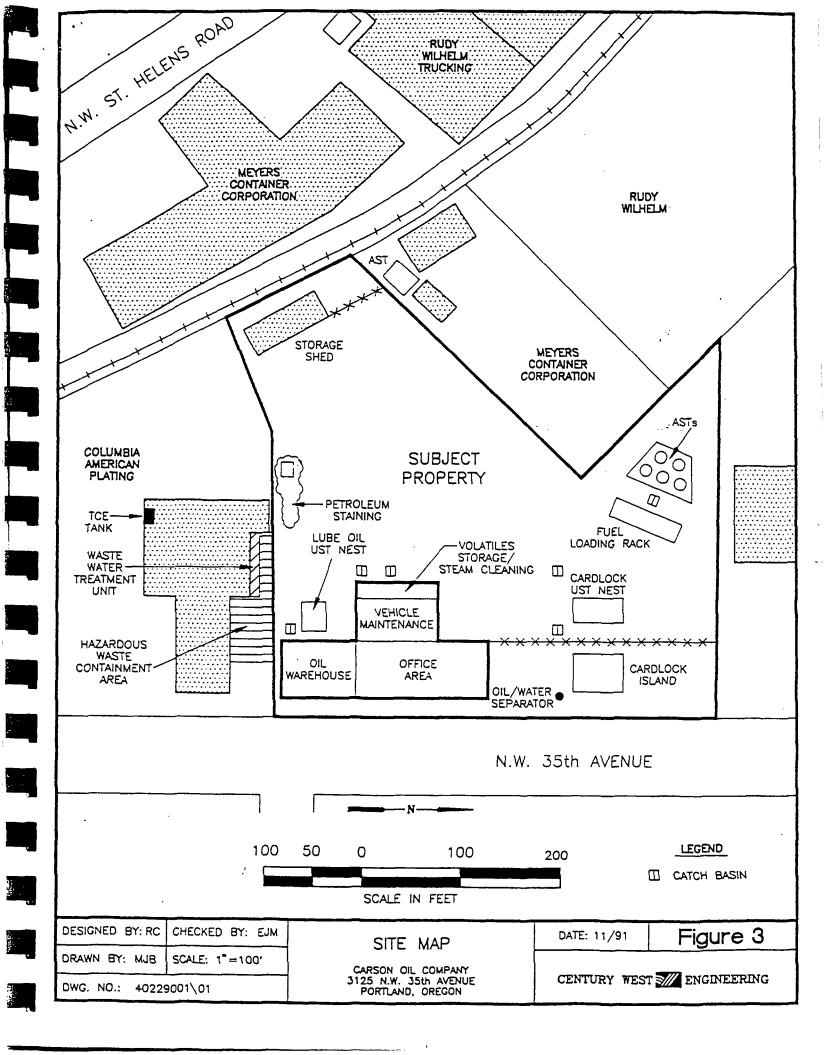
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Aerial Photographs for the years 1936, 1945, 1967, and 1989.







APPENDIX A
SCOPE OF SERVICES

EXHIBIT A

SCOPE OF SERVICES

Level I Environmental Site Assessment (Oregon)

PURPOSE OF ASSESSMENT

The purpose of the Level I Environmental Site Assessment (ESA) is to assess the potential risk that the subject property may be contaminated by hazardous substances (including petroleum products), that hazardous substances may be located on or under the property, or that existing conditions on the property may violate applicable environmental laws.

The Environmental Site Assessment is focused on the land and does not attempt to discover or define those conditions in a building which would contribute to indoor hazards such as sick building syndrome. Nor does the assessment include collection or analysis of samples of soil, groundwater, or materials suspected of containing asbestos or other hazardous substances; or testing for radon gas. Furthermore, the assessment does not attempt to designate previously unidentified wetlands.

SCOPE OF WORK

In order to satisfy the above stated purpose, the assessment will consist of an examination of all reasonably ascertainable and readily accessible information regarding current operations on the property, its land-use history, and a general characterization of surrounding land uses. The assessment will also include a physical examination of the property. Details of the services provided follow:

TASK 1: RECORDS RESEARCH AND COMPILATION OF SITE-SPECIFIC INFORMATION

Examination of selected information determined to be pertinent to the subject property. Records examinations are not all-inclusive and may be limited by the Client's schedule, financial commitment, and the availability of information.

RESPONSIBILITIES OF CLIENT

- 1. Provide a title search and chain-of-title or title abstract to the property(s).
- 2. Provide applicable in-house reports or information.
- 3. Arrange for Engineer (Century West) access to owner and/or tenant.

SERVICES TO BE PROVIDED BY CENTURY WEST

- 1. Examine Client-provided documents and interview appropriate individuals regarding current or past use of the property that may have led to potentially adverse environmental impacts.
- 2. Examine Oregon Department of Environmental Quality (DEQ) files for documented releases of regulated materials at the site. If releases have occurred, determine what corrective actions were taken, and evaluate the adequacy of those actions.
- 3. Determine whether any of the current tenants are regulated under the Resource Conservation and Recovery Act (RCRA) as a generator of hazardous waste, or the owners or operators of treatment, storage, or disposal facilities for hazardous waste.
- 4. Review the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Information System List (CERCLIS List) to determine whether there are any known existing or abandoned hazardous materials handling sites or facilities within one mile of the property.
- 5. Review DEQ lists of registered or permitted Underground Storage Tanks (USTs) including lists of leaking USTs.
- 6. Contact current property owner and tenant(s) and appropriate state and local agencies and other sources of public information to evaluate the past uses of the property, and whether past or current uses of the property involve substances subject to environmental regulation, or may have led or may lead to potentially adverse impacts to the environment.
- 7. Review State Fire Marshal and local fire department records.

TASK 2: SITE EXAMINATION

Conduct a site visit to the property. The following subtasks will be performed as part of this task.

SERVICES TO BE PROVIDED BY CENTURY WEST

1. Conduct a Site Examination visit. Make on-site observations for evidence of:
1) procedures that reduce or eliminate opportunity for release of hazardous substances into the environment; and 2) current or past practices which may be indicative of environmental contamination. Observe whether visible evidence of hazardous and/or toxic substances (except asbestos) is present. Note observable violations of applicable environmental regulations.

The site visit will identify (through visual and olfactory observation) potential sources of adverse environmental impacts, including the presence of USTs, stored drums, waste storage piles or impoundments, pipelines and landfilled materials.

- 2. View the contiguous properties from the subject property and from public right-of-ways. Evaluate whether potential sources exist on those properties which could lead to adverse impacts to the subject property.
- 3. Identify specific areas where, based upon the above tasks and subtasks, testing and/or subsurface investigations are required.
- 4. Photograph pertinent conditions observed in Subtasks 1 and 2.

RESPONSIBILITIES OF CLIENT

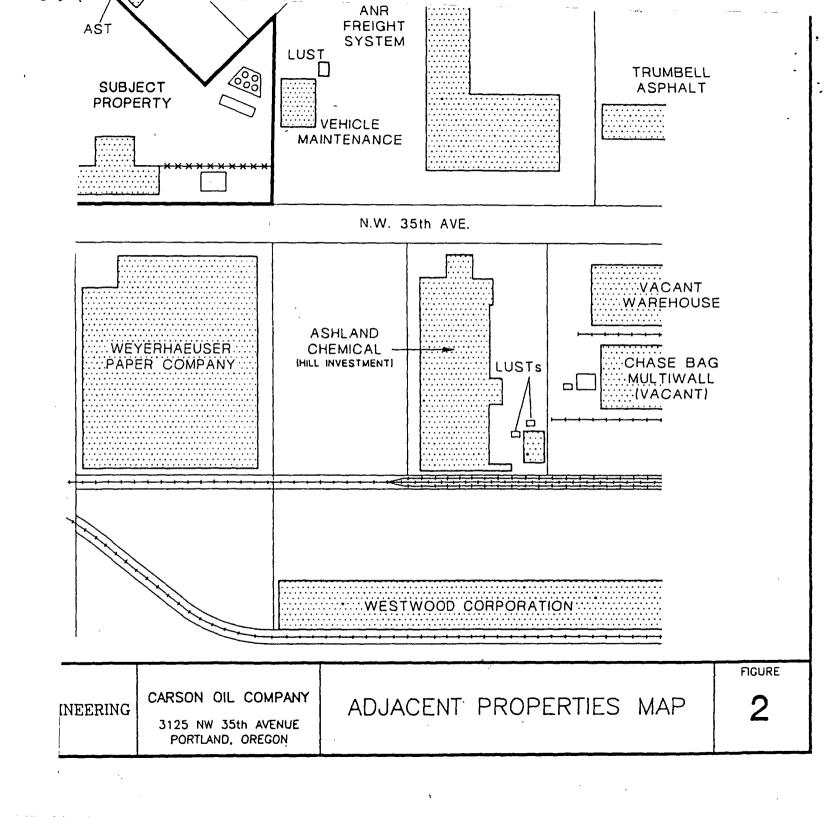
- 1. Arrange for access to site and building.
- 2. Designate contact person(s).

TASK 3: REPORT

Based upon information gained in Tasks 1 and 2 of the Environmental Site Assessment, Century West will prepare a written report which summarizes the findings of the investigation. The report will be a confidential document and include the following information (where applicable):

- 1. A history of known or suspected past and current uses of the property, including known or suspected activities conducted in connection with such uses that create a reasonable suspicion that the property may not be in compliance with current environmental regulations.
- 2. Identification of areas on the property which show a probability of having been contaminated by past or current facility operational practices.
- 3. Lists of properties adjacent to the subject property with known potential contaminants (e.g., USTs, hazardous waste generators) and properties within the vicinity where potential or confirmed releases have been documented (e.g., CERCLIS, Site Assessment Database).
- 4. Identification of areas of insufficient information regarding the site.
- 5. Recommendations for further testing and/or subsurface investigations, if required. Such recommendations will include a statement outlining the testing or investigation objectives.

Three copies of the report will be issued to the Client unless otherwise requested.



APPENDIX B
AERIAL PHOTOGRAPHS





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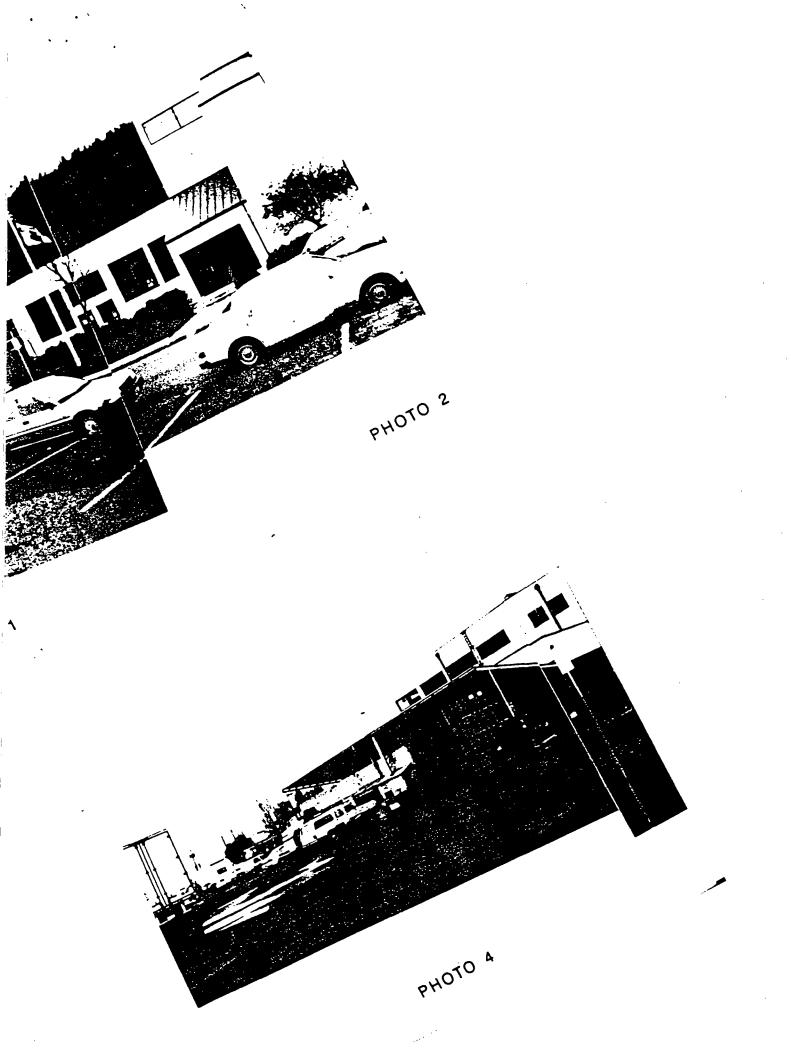
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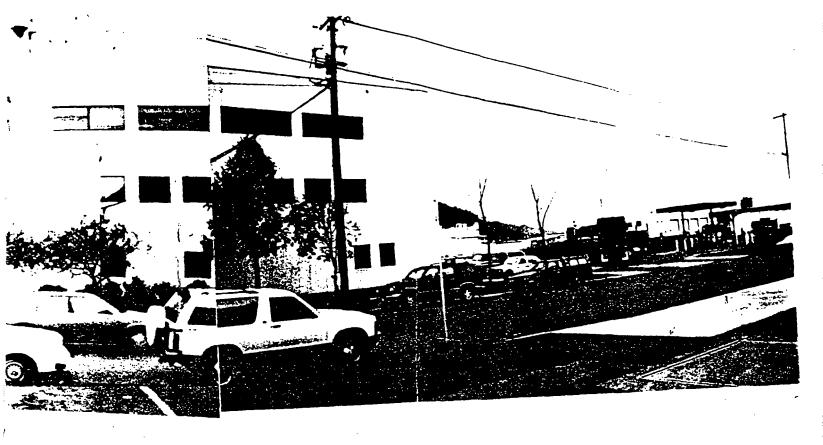
CENTURY WEST MENGINEERING

APPENDIX C PHOTOGRAPHS OF THE SUBJECT PROPERTY

Photograph Descriptions

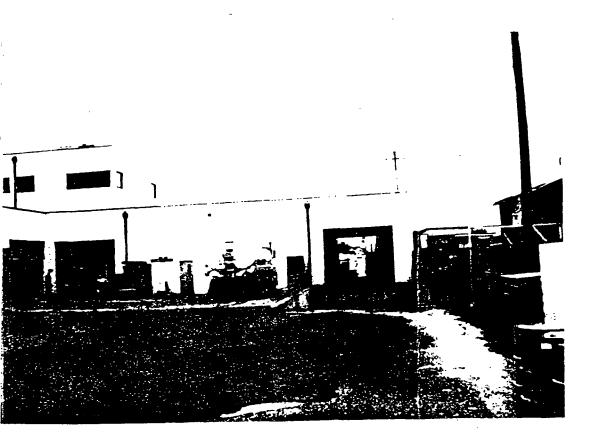
- 1-3) Panorama looking to the west across NW 35th Avenue. The office area of Columbia American Plating (CAP) is located beyond the utility poles in photo 1. The main building on the subject property is in all three photos. The oil warehouse area is the single story portion of the building to the left. The cardlock fuel island is to the extreme right of photo 3.
- Panorama looking east at the western elevation of the main building. CAP is located to the far right of photo 5. The two open bay doors enter the oil warehouse area. The lube oil USTs are located behind and to the left of the tanker in photo 5. The closed bay door is for the vehicle maintenance area. The space under the structure with the sloped roof in photo 4 houses the volatiles storage area and the steam cleaning bay.
- Panorama looking north from the west-central portion of the property. Part of the Myers Container Corporation (MCC) property is visible on the left of photo 6. The new ASTs and loading rack are to the right in photo 6. The ANR Freight Systems vehicle maintenance building is beyond the fence in the center of photo 7.
- 8) Photo looking south. The interior of the steam cleaning pad and volatiles storage area.
- 9) Photo looking south. The front of the vehicle maintenance area.
- 10-11) Photo looking south. The interior of the vehicle maintenance area. Note the small solvent tank in the lower right hand corner of photo 11.
- Photo looking south. The northern elevation of part of the CAP property. The CAP waste water treatment unit is located in the plywood shelter on the side of the plating building. The hazardous waste "containment area" is located to the north and east of the treatment unit. Many of the drums lining the fence on the CAP property contain hazardous waste.
- 14) Photo looking south. Close up of some of the drums lining the fence. Note the blue drum on the right has been hand labelled "hazardous waste".
- 15-16) Panorama to the west. The Carson Oil storage shed is to the left in photo 15. The back portion of the MCC property is in the background in photo 15 and along the fence in photo 16. Note the staining on the silver AST located on the MCC property in photo 16.





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РНОТО 3



РНОТО 5

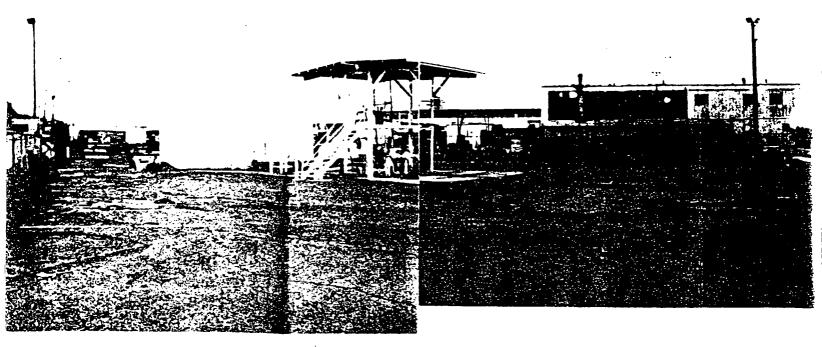
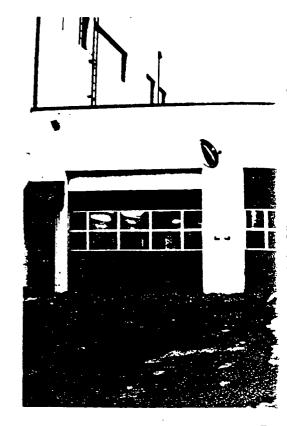


PHOTO 6 PHOTO 7



РНОТО 8





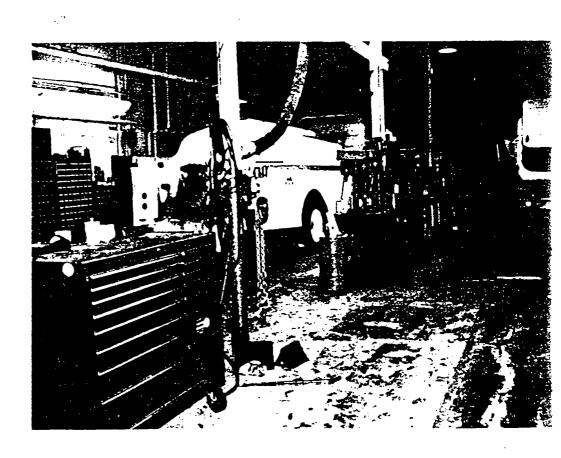


PHOTO 10





TO 9



PHOTO 11

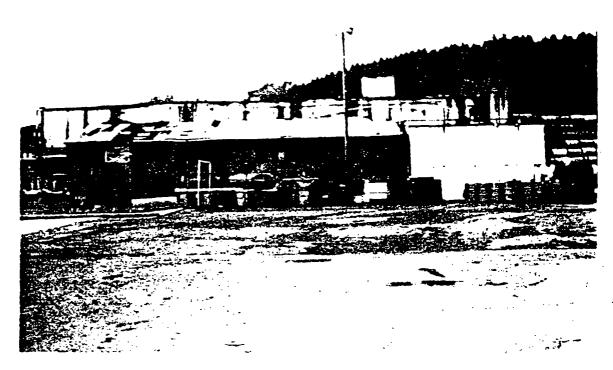


PHOTO 13

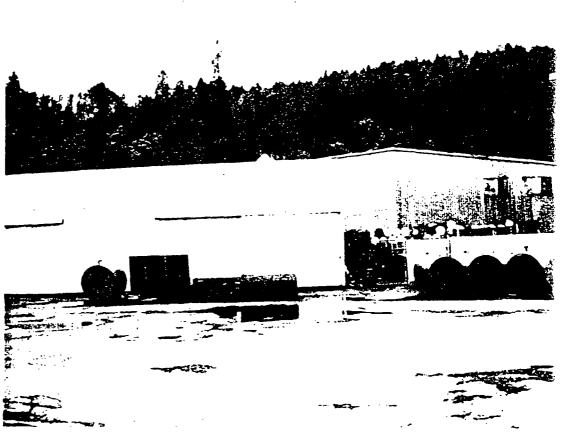


PHOTO 15

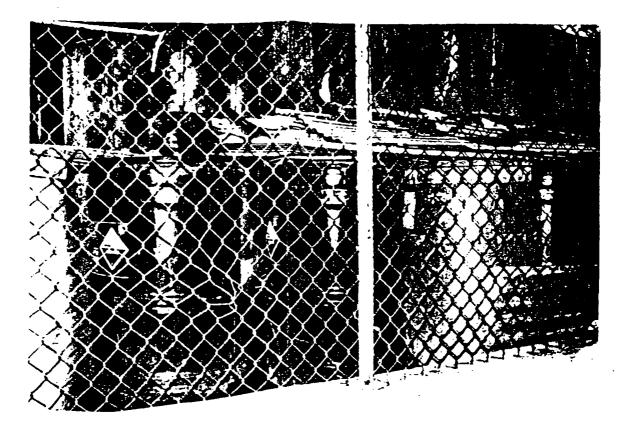


PHOTO 14

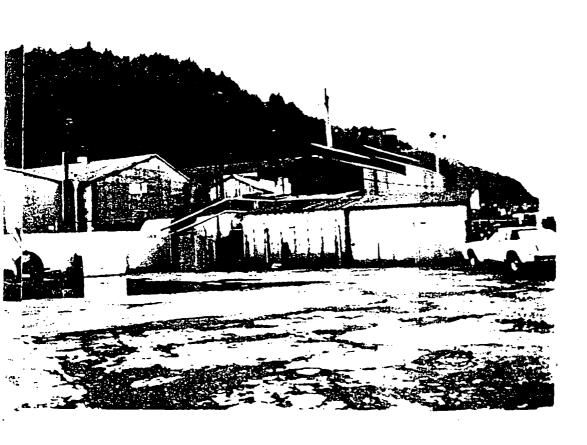


PHOTO 16

APPENDIX D

CARSON OIL COMPANY UST REGISTRATION FORM

oursip # 12937

1.D. Number

STATE USE ONLY

Date Received

GENERAL INFORMATION

Notification is required by Federal law for all underground tanks that have been used to store regulated substances since January 1, 1974, that are in the ground as of May 8, 1986, or that are brought into use after May 8, 1986. The information requested quired by Section 9002 of the Resource Conservation and Recovery Act. (RCRA), mended.

The primary purpose of this notification program is to locate and evaluate underground tanks that store or have stored petroleum or hazardous substances. It is expected that the information you provide will be based on reasonably available prds, or, in the absence of such records, your knowledge, belief, or recollection.

Who Must Notify? Section 9002 of RCRA, as amended, requires that, unless exampted, owners of underground tanks that store regulated substances must notify designated State or local agencies of the existence of their tanks. Owner means—

(a) in the case of an underground storage tank in use on November 8, 1984, or

ught into use after that date, any person who owns an underground storage tank if for the storage, use, or dispensing of regulated substances, and

but no longer in use on that date, any person who owned such tank immediately before the discontinuation of its use.

What Tanks Are Included? Underground storage tank is defined as any one or hibination of tanks that (1) is used to contain an accumulation of "regulated subnes." and (2) whose volume (including connected underground piping) is 10% or more beneath the ground. Some examples are underground tanks storing: 1, gasoline, used oil, or diesel fuel, and 2, industrial solvents, pesticides, herbicides or fumigants.

What Tanks Are Excluded? Tanks removed from the ground are not subject to

ification. Other tanks excluded from notification are: arm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel

for noncommercial purposes;

2. tanks used for storing heating oil for consumptive use on the premises where stored;

1. septic tanks;

bmitted information is true, accurate, and complete.

Até of owner or owner's authorized representative

FREY L. MOHE CONTROLLEN

4. pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws;

5. surface impoundments, pits, ponds, or lagoons:

6. storm water or waste water collection systems;

7. flow-through process tanks:

8, liquid traps or associated gathering lines directly related to oil or gas production and gathering operations;

9, storage tanks situated in an underground area (such as a basement, cellar, mineworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

What Substances Are Covered? The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of those substances regulated as hazardous waste under Substitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute).

Where To Notify? Completed notification forms should be sent to the address given at the top of this page.

When To Notify? 1. Owners of underground storage tanks in use or that have been taken out of operation after January 1, 1974, but still in the ground must notify by May 8, 1986. 2. Owners who bring underground storage tanks into use after May 8, 1986, must notify within 30 days of bringing the tanks into use.

Penalties: Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed \$10,000 for each tank for which notification is not given or for which false information is submitted.

INSTRUCTIONS

Please type or print in ink all items except." signature in Section has been containing underground storage tanks. If more the ocopy the reverse side, and staple continuation sheets to the	an 5 tanks are owned at this location, continuation sheets 2
I. OWNERSHIP OF TANK(S)	II. LOCATION OF TANK(S)
Owner Name (Corporation, Individual, Public Agency, or Other Entity)	(If same as Section 1, mark box here
CARSON OIL CO, INC.	Facility Name or Company Site Identifier, as applicable
Street Address 3125 D.W.35TH ST.	<u> </u>
MULTHOMAH	Street Address or State Road, as applicable
City PORLANO OLEGON 9721	
Б Code Phone Number 503 – 224 ~ 85ФФ	City (nearest) State ZIP Code
Current State of Local Govt Cor	ate or Indicate Mark box here if tank(s) porate number of are located on land within an Indian reservation or
(GSA facility I.D. no. unc	ertain location on other Indian trust lands
	CT PERSON AT TANK LOCATION
 /	lob Title Area Code Phone Number
BRICE HARRINGTON OPER	17/015 MANAGES 503-224-8500
IV.	TYPE OF NOTIFICATION
Mark box here only if this is	an amended or subsequent notification for this location.
V. CERTIFICATION	(Read and sign after completing Section VI.)
tify under penalty of law that I have personally example the currents, and that based on my inquiry of those indivi-	nined and am familiar with the information submitted in this and all attached duals immediately responsible for obtaining the information, I believe that the

Signature

CONTINUE ON REVERSE SIDE

Date Signed

5/26/88

Name (from Section I)	ocation (from Sec	tion II)		_ Page No	- ol
VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS (Complete for each tank at this location.)					×
t Identification No. (e.g., ABC-123), or trarily Assigned Sequential Number (e.g., 1,2,3)	Tank No.	Tank No.	Tank No.	Tank No.	Tank No
Currently in Use Temporarily Out of Use Permanently Out of Use Brought into Use after 5/8/86	NOON	NOON	8008		ROOR
stimated Age (Years) Estimated Total Capacity (Gallons)	20,000	1 20,000	20.000	20.000	10.000
Material of Construction Steel flark one 図) Concrete Fiberglass Reinforced Plastic Unknown Other, Please Specify	\$7 P.33	දු සි	, 		STIP 3
Internal Protection flark all that apply (X) Interior Lining (e.g., epoxy resins) None Unknown Other, Please Specify	STIP3	STIP3	\$71P3	ST/P3	STIR3
External Protection Painted (e.g., asphaltic) Fiberglass Reinforced Plastic Coated None Unknown Other, Please Specify	STIP3	\$71P3	\$\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		STIP3
Bare Steel Mark all that apply ☑) Galvanized Steel Fiberglass Reinforced Plastic Cathodically Protected Unknown					
Other, Please Specify ubstance Currently or Last Stored in Greatest Quantity by Volume a. Empty					
(Mark all that apply (a) Diesel Kerosene Gasoline (including alcohol blends) Used Oil Other, Please Specify				NOO	
c. Hazardous Substance					
Chemical Abstract Service (CAS) No. Mark box 🗷 if tank stores a mixture of substances d. Unknown					
ditional Information (for tanks permanently ken out of service)	,	,	,	,	
a. Estimated date last used (mo/yr) Estimated quantity of substance remaining (gal.) c. Mark box 2 if tank was filled with inert material (e.g., sand, concrete)					
	1				

her Name (from Section I)					
VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS (Complete for each tank at this location.)					
Tank Identification No. (e.g., ABC-123), or hitrarily Assigned Sequential Number (e.g., 1,2,3)	Tank No.	Tank No.	Tank No.	Tank No.	Tank No.
Temporarily Out of Use Permanently Out of Use Brought into Use after 5/8/86	NOON .	4004	NOOP		NOON
Estimated Age (Years)	2/3	2/3	2/3	2/3	2/3
Estimated Total Capacity (Gallons)	2000	2000	2000	3000	3000
4. Material of Construction Steel (Mark one 図) Concrete Fiberglass Reinforced Plastic Unknown Other, Please Specify					
5. Internal Protection Cathodic Protection (Mark all that apply 図) Interior Lining (e.g., epoxy resins) None Unknown					
Other, Please Specify					
6. External Protection Cathodic Protection (Mark all that apply 2) Painted (e.g., asphaltic) Fiberglass Reinforced Plastic Coated None Unknown Other, Please Specify					
Piping Bare Steel (Mark all that apply 図) Galvanized Steel Fiberglass Reinforced Plastic Cathodically Protected Unknown Other, Please Specify					
Substance Currently or Last Stored a. Empty				-	
in Greatest Quantity by Volume (Mark all that apply 2) Capable (Mark all that apply 2) Diesel Kerosene Gasoline (including alcohol blends) Used Oil Other, Please Specify c. Hazardous Substance	LUBE OIL	LUBE OIL	LUBÉ OIL	LWBE OIL	Luaf old
Please Indicate Name of Principal CERCLA Substance					
Chemical Abstract Service (CAS) No. Mark box 🖾 if tank stores a mixture of substances d. Unknown					
*dditional Information (for tanks permanently ken out of service)					
 a. Estimated date last used (mo/yr) b. Estimated quantity of substance remaining (gal.) 	/		/		
c. Mark box 🗷 if tank was filled with inert material (e.g., sand, concrete)		· 🗀			
4 Form 7530-1 (11-85) Reverse ★ u.:	S. Government Printing	Office: 1988-498-735	i		Page 2

VI_DESCRIPTION OF UNDERGROUND STORAGE TANKS (Complete for each tank at this location.)					
: Identi/Icatเวิก No. (e.g., ABC-123), or barily Assigned Sequential Number (e.g., 1,2,3)	Tank No.	Tank No.	Tank No.	Tank No.	Tank No.
Currently in Use Temporarily Out of Use Permanently Out of Use Brought into Use after 5/8/86					
timated Age (Years) nated Total Capacity (Gallons)	2/3	<u> </u> ටිණුව	6000	6000	6000
aterial of Construction Steel Tark one ②) Concrete Fiberglass Reinforced Plastic Unknown Other, Please Specify	3000	2000		ς ειο Σ	
ternal Protection fark all that apply 图) Interior Lining (e.g., epoxy resins) None Unknown Other, Please Specify	8 I I I I				
Cathodic Protection Painted (e.g., asphaltic) Fiberglass Reinforced Plastic Coated None Unknown Other, Please Specify					
Bare Steel Galvanized Steel Fiberglass Reinforced Plastic Cathodically Protected Unknown Other, Please Specify	- -				
stance Currently or Last Stored reatest Quantity by Volume Wark all that apply (2) Gasoline (including alcohol blends) Used Oil Other, Please Specify Last Stored a. Empty b. Petroleum Diesel Kerosene Gasoline (including alcohol blends) Used Oil Other, Please Specify Last Stored A. Empty b. Petroleum Diesel Kerosene Gasoline (including alcohol blends) Used Oil	TIDEE OILLS	Luce oils	TOBE OILY	LUASE OILS	LUBE OILS
lease Indicate Name of Principal CERCLA Substance OR Chemical Abstract Service (CAS) No. Mark box 🗷 if tank stores a mixture of substances d. Unknown					
**tional Information (for tanks permanently a out of service) a. Estimated date last used (mo/yr) Estimated quantity of substance remaining (gal.) c. Mark box 3 if tank was filled with inert material (e.g., sand, concrete)	/ /	/	/	/	Page 2:

APPENDIX E COLUMBIA AMERICAN PLATING INFORMATION